

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

SANDRA VILLERS (01)

Criminal No. 3:16-CR-78-N

FILED UNDER SEAL

PLEA AGREEMENT SUPPLEMENT

The defendant, Sandra Villers, the defendant's attorney, Jeffrey Grass, and the United States of America (the government), agree that the following additional terms are part of the Plea Agreement in the above-captioned case:

1. The defendant agrees to fully cooperate with the United States, its agencies, and other law enforcement agencies and provide truthful and complete information and/or testimony before any Federal grand jury, the United States District Court, or in any other proceeding, concerning her participation in the offense of conviction and knowledge of criminal activities.

2. If, in its sole discretion, the government determines that the defendant has provided substantial assistance in the investigation or prosecution of others, it will file a motion urging sentencing consideration for that assistance. Whether and to what extent to grant the motion are matters solely within the Court's discretion.

3. The government agrees that USSG § 1B1.8 is applicable to the defendant. Any information provided by the defendant, other than that charged in the indictment, in connection with the defendant's assistance to the United States, including debriefing and

testimony, will not be used to increase the defendant's Sentencing Guideline level or used against the defendant for further prosecution, if in the opinion of the United States Attorney the defendant has met all of the defendant's obligations under the Plea Agreement and provided full, complete, and truthful information and testimony. However, nothing revealed by the defendant during the defendant's debriefings and testimony would preclude the defendant's prosecution for any violent crime.

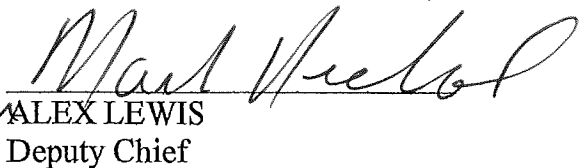
4. To facilitate the defendant's cooperation, the parties agree that the United States may request a continuance of the sentencing.

AGREED TO AND SIGNED this 24th day of June, 2016.

JOHN R. PARKER
United States Attorney



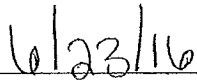
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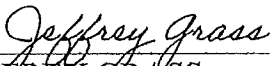
ALEX LEWIS
Deputy Chief

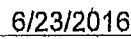
I have read (or had read to me) this Plea Agreement Supplement and have carefully reviewed every part of it with my attorney. I fully understand it and voluntarily agree to it.


SANDRA VILLERS
Defendant


Date

I am the defendant's counsel. I have carefully reviewed every part of this Plea Agreement Supplement with the defendant. To my knowledge and belief, my client's decision to enter into this Plea Agreement is an informed and voluntary one.


JEFFREY GRASS
Attorney for Defendant


Date